

**Health and Safety Guidelines for Reopening of Casino Operations**  
(last updated May 14, 2020)

The purpose of this communication is to set forth minimum standards for a limited initial reopening of Indiana's casinos. This will be known as Phase One. Each casino wishing to participate in Phase One will be required to submit a detailed plan corresponding to each point below. Successful plans will include extensive detail regarding how each objective will be met, focus heavily on the health and safety of all employees and patrons, and serve to provide confidence to the public that gaming will commence in a measured and responsible manner under conditions now necessary during the COVID-19 pandemic. This communication solely sets forth the minimum standards. Casinos are not precluded from implementing procedures and policies in addition to, or more stringent, than those listed below.

**COVID-19 Preparedness and Response Plans**

Each casino must develop a COVID-19 Preparedness and Response Plan consistent with current Centers for Disease Control (CDC) and Occupational Safety and Health Administration (OSHA) recommendations, Indiana State Department of Health guidance, Governor Holcomb's executive orders and Indiana Gaming Commission (IGC) guidelines. Response plans must be submitted at least seven (7) days prior to any reopening. Prior to reopening, all casinos shall conduct a full cleaning and disinfecting of its facility in accordance with CDC and OSHA guidelines. Plan adherence should be included under the compliance department and subject to all customary reporting and IGC audits.

**Training**

Training programs to educate all employees regarding COVID-19, its symptoms, and measures required to limit its transmission, must be outlined in detail.

**Daily Health Screening**

Employees and patrons shall undergo a daily health screening. Casino plans shall detail procedures for implementing the daily health screening that will be conducted at points of ingress via greeters and signage. Screening questions, at a minimum, shall include the following: (1) Have you traveled to any CDC Level 3 Travel Warning Country or been in close contact with anyone who has traveled to those areas within the last 14 days? This currently includes China, Iran, most European countries, the United Kingdom, and Ireland (listed countries shall be updated in accordance with CDC and/or State Department guidance); (2) Have you had close contact with or cared for someone diagnosed with COVID-19 within the last 14 days?; and (3) Have you experienced any cold or flu-like symptoms in the last fourteen (14) days (fever, cough, chills, head ache, sore throat, new loss of sense of smell or taste, muscle pain, shortness of breath, or other respiratory problem)? Patrons or employees answering yes to any of the above questions should not be permitted access to the casino.

**Employees**

Employees should be instructed to stay at home if they do not feel well, and to contact a supervisor if they notice a co-worker or patron experiencing COVID-19 symptoms. Social distancing and proper disinfecting procedures must also be enforced back of house, including but not limited to: employee dining rooms, lockers, entrances, pre-shift meetings and security podiums. Plans should also include detailed cleaning procedures for shared equipment and uniforms. Employees should undergo temperature checks upon arrival for each shift with an acceptable temperature of 100.4 degrees or under. Casinos shall not issue attendance “points” or discipline to employees who do not attend work due to experiencing COVID-19 symptoms, are subject to a mandated quarantine or have a positive COVID-19 diagnosis. Casinos shall be sensitive to the fact that incentives or bonuses tied to attendance may encourage employees to come to work while sick and may wish to be flexible in administering any such programs during this time.

**Occupancy**

Phase One occupancy shall be limited to the number of available gaming positions with implemented social distancing plus 50%, or 50% of capacity, whichever is less. Casinos must demonstrate the ability to accurately count patrons and limit admittance as necessary to enforce the occupancy limit, this may include, for example, reservation and queuing systems. In circumstances where the casino has reached its capacity, efforts must be made to prevent patrons from congregating in violation of the six (6) foot social distancing guideline.

**Social Distancing Requirements**

Based upon the guidance from health authorities, the IGC will require social distancing of six (6) feet for patrons not traveling together to be enforced in all areas of casino floors, including player’s club areas. It is the responsibility of each casino to increase the number of security officers and other employees per shift to provide appropriate support of this objective. Areas where interactions with casino employees may require less than six (6) feet of social distancing should be assessed for the installation of clear barriers to reduce the potential for COVID-19 transmission.

**Ingress and Egress**

Effort should be made to segregate the points of ingress and egress in order to best ensure social distancing in high traffic areas. Touchless doors and/or efforts made to reduce the touching of doors, should be implemented where possible. Disinfecting products must be available for patrons use at each point of ingress and egress and patrons must be required to use hand sanitizer before gaining admittance. Greeters shall be present at points of ingress and egress to ensure compliance with these guidelines and casino approved plans. Casinos shall acquire equipment which can be deployed to provide non-invasive temperature checks for patrons with an acceptable temperature of 100.4 degrees, or under, for admittance and procedures for managing patrons whose temperature exceeds 100.4 degrees. Plans should address any potential violations of Health Insurance Portability and Accountability Act (HIPAA) resulting from asking patrons about their health.

**Elevators, Escalators and Stairways**

Where possible, elevators should be set to eliminate stops between the point of entry and the desired floor. No more than three (3) individuals not traveling together, should be permitted on an elevator at any time. Utilization of escalators and stairways must be monitored to ensure that individuals traveling in opposite directions are able to maintain social distance. Appropriate signage must be in place and casino employees must be available to support compliance.

**Air Quality**

Each casino must outline measures taken to ensure air quality, including the utilization of high quality filtration and increasing the amount of fresh air inside facilities. Smoking should be limited to a designated area and casinos shall establish procedures to ensure social distancing measures will be observed. Plumbing and HVAC systems should be inspected by appropriately qualified maintenance personnel.

**Electronic Gaming Devices and Sportsbooks**

Machines must be deactivated or taped off and chairs must be removed as necessary to ensure patrons are not within six (6) feet of each other while playing slot machines or electronic table games. Sportsbooks, including kiosks and betting windows, must also implement social distancing guidelines.

**Table Games**

Table games will be limited to three (3) players each, roulette games to four (4) players each, and craps games to six (6) players each, all distanced at least six (6) feet apart. No person may be within six feet of a person seated at a table. Cards must be replaced before each shift with the touching of cards by patrons limited to the extent possible. Chips must be disinfected at least every two (2) hours. Dice must be disinfected for each new shooter. Poker rooms and Pai Gow will not be permitted to open in Phase One. All individuals participating in table games – patrons and casino employees – must wear masks. No smoking is permitted by patrons participating in table game activities. Casino employees must ensure patrons not participating in the activities do not congregate around table games, and over-the-shoulder play is not permitted.

**Queuing Areas**

All queuing areas must have floor markings or other methods of identifying proper distancing. Sufficient casino employees must be available to provide reminders to patrons not adhering to a six (6) foot distance from others.

**Personal Protective Equipment**

Each plan shall include provisions requiring masks and other appropriate personal protective equipment (PPE) for all casino employees to be worn at all times while on the casino floor. PPE should be provided at no cost to employees. PPE for patrons is recommended, except when it is necessary for a patron's identity to be verified. Casinos may require patrons to wear facial coverings and shall establish procedures to respond to patrons refusing to comply. Casinos shall make PPE available to patrons if it is requested. Resources to provide for the proper disposal of

used PPE are required. Anticipated product need and due diligence in ensuring continuing availability of PPE shall be provided in the submitted plan.

### **Identity Checks**

Each plan must provide a safe location for patrons to remove their masks or facial coverings, briefly, in order to verify identity prior to entering the gaming floor and at other times as required for certain transactions. Surveillance must record a facial shot of each patron.

### **Signage and Other Safety Communication**

Effectively communicating new casino policies and patron responsibilities will be key to a successful Phase One reopening. Each casino will need to outline the content and location of all communication. Information from the CDC, OSHA and State Department of Health regarding handwashing, need to stay home if sick, and other health information, must be displayed at each property in prominent areas.

### **Cleaning and Disinfection**

Each casino must have detailed plans for the cleaning and disinfecting of all areas of the gaming floor and have no fewer than a ratio of one dedicated cleaner for every fifty (50) gaming positions. Every effort should be made to disinfect each machine as a patron ceases play there. Objects touched with high frequency, such as ATM's and counters, should be disinfected as often as feasible. Disinfecting products must be made available in all areas of the casino to enable patrons to disinfect frequently touched surfaces at their discretion, as well as hand sanitizer. Anticipated product need and due diligence in ensuring continuing availability of cleaning and disinfecting products shall be provided in the submitted plan.

In addition to enhanced regular cleaning and disinfecting, each plan should outline deep cleaning and disinfecting measures and the interval at which these activities will occur. Casinos may submit a request to reduce hours and scale back on operations based on less traffic or for purposes of sanitization efforts.

### **Waivers and Revised Internal Control Procedures**

Each plan should include waiver requests, as well as revised internal controls, necessary to implement Phase One operations. If a casino believes any part of its plan should be treated as confidential, it should designate that particular section as "confidential" with a citation to the corresponding section under the Indiana Access to Public Records Act (IC 5-14-3). Additionally, pursuant to 68 IAC 11-1-3, casinos may designate their related internal controls "confidential" by stamping or otherwise marking the relevant pages.

### **Restaurants and Hotels**

Restaurants off the casino floor and hotels must adhere to requirements established by the State of Indiana. Restaurants and food outlets not separated from gaming areas will not be permitted to provide food for consumption on the casino floor. Spas and other property amenities shall comply with all requirements imposed on similar businesses in Indiana.

**Prohibited Phase One Activities**

The following are prohibited during Phase One:

- Food and drink on the casino floor
- Concerts, nightclubs, live events and shows
- Promotions and other activities likely to create challenges in meeting social distancing requirements
- Valet service
- Coat check
- Buffets
- Poker and Pai Gow rooms (also referenced above)

**Reporting**

If a casino is informed or alerted of a confirmed case of COVID-19 at its property, whether patron or employee, it must notify and cooperate with the local health authorities. Notice to the IGC is also required. Plans should identify a casino property liaison to assist local health authorities with data sharing and contact tracing. Casinos must inform employees who have had contact with individuals who have tested positive for COVID-19. In addition, casinos shall also detail specific disinfectant plans and procedures in the event notice is received of a COVID-19 positive test for an employee or patron, following their presence at a casino property.

**Approval of Plans**

The IGC will seek guidance from public health experts in evaluating submitted plans. In moving forward with a Phase One plan, casinos should be advised that reopening dates are subject to change as new data emerges. Limitations applicable to casinos imposed by local jurisdictions could impact a casino opening. Phase One guidance is also subject to revision as necessary. Gaming Enforcement Agents will assist in evaluating the execution of approved plans and additional requirements may be imposed on specific properties. Every effort will be made to provide adequate notice of revised requirements, but it is possible that changes will be made on an emergency basis in the interest of public health.